

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re:	:	
Deidre E. McAllister	:	CHAPTER 13
Debtor	:	
	:	No. 18-15906-jkf

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**DEBTOR'S RESPONSE TO  
MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS  
INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2014-1,  
FOR RELIEF FROM THE AUTOMATIC STAY PROVISIONS OF 11 U.S.C. § 362(A)  
TO PERMIT MOVANT TO COMMENCE OR CONTINUE FORECLOSURE  
PROCEEDINGS ON 1137 S 13TH ST., PHILADELPHIA, PA 19147**

1. Admitted.

2-7. Denied. These averments contain conclusions of law, to which the applicable rules of civil procedure do not require a response, and the same is therefore denied. By way of further response, Debtor believes and therefore avers that Movant has failed to comply with regulations of assignment as governed by Pennsylvania and/or Federal Law, and the same is therefore denied. Strict proof is demanded at time of hearing.

8-9. Admitted.

10-11. Denied. These averments contain conclusions of law, to which the applicable rules of civil procedure do not require a response, and the same is therefore denied. Strict proof is demanded at time of hearing.

12. Admitted.

13-15. Denied. These averments contain conclusions of law, to which the applicable rules of civil procedure do not require a response, and the same is therefore denied. Strict proof is demanded at time of hearing.

16. Admitted.

13-15. Denied. These averments contain conclusions of law, to which the applicable rules of civil procedure do not require a response, and the same is therefore denied. Strict proof is demanded at time of hearing.

WHEREFORE, Debtor prays that this honorable Court DENY the Movants Motion for Relief from the Automatic Stay WITH PREJUDICE.

Date:10/4/19

Respectfully submitted.

/S/ Erik B. Jensen  
Erik B. Jensen, Esq.

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**CERTIFICATE OF SERVICE**

I, Erik B. Jensen, esquire do hereby certify that a true and correct copy of the Debtor's Response to Motion for Relief was served upon the Chapter 13 Standing Trustee, Scott Waterman, Esquire and Michael J. Shavel, Esquire via electronic mail on October 4, 2019.

Date:10/4/19

Respectfully submitted.

/S/ Erik B. Jensen  
Erik B. Jensen, Esq.